

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, DC 20554

In the Matter of )

Amendment of the Commission's Rules to )  
Establish Part 27, the Wireless Communications )  
Service ("WCS") )

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GN Docket No. 96-228

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WASHINGTON, D.C. 20554

**COMMENTS OF  
PRIMECO PERSONAL COMMUNICATIONS, L.P.**

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## **TABLE OF CONTENTS**

	<b>Page</b>
I. INTRODUCTION AND SUMMARY .....	1
II. THE PUBLIC INTEREST REQUIRES THAT IMPLEMENTATION OF THE NEW WCS AVOID PREJUDICE TO EXISTING LICENSEES .....	4
III. WCS LICENSES SHOULD BE AWARDED ON AN MTA BASIS .....	9
IV. WCS LICENSES SHOULD BE SUBJECT TO BUILD-OUT REQUIREMENTS . ....	11
V. WCS LICENSES SHOULD BE AWARDED IN 5 MHz BLOCKS. ....	11
VI. PUBLIC SAFETY RADIO SERVICE CONSIDERATIONS .....	13
VII. CONCLUSION .....	14

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PRIMECO PERSONAL COMMUNICATIONS, L.P.**

PrimeCo Personal Communications, L.P. ("PrimeCo"), an A and B Block  
broadband PCS licensee,<sup>1/</sup> hereby files comments in response to the *Notice of Proposed  
Rule Making* issued in the above-captioned proceeding.<sup>2/</sup>

**I. INTRODUCTION AND SUMMARY**

The Omnibus Consolidated Appropriations Act of 1997<sup>3/</sup> ("Appropriations  
Act") directs the Commission to reallocate the frequencies at 2305-2320 and 2345-2360

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<sup>1/</sup> PrimeCo is a limited partnership comprised of PCSCO Partnership (owned by NYNEX PCS, Inc. and Bell Atlantic Personal Communications, Inc.) and PCS Nucleus, L.P. (owned by AirTouch PCS Holding, Inc. and U S WEST PCS Holdings, Inc.). PrimeCo is the broadband PCS licensee or owns a majority ownership interest in the licensee in the following MTAs: Chicago, Milwaukee, Richmond-Norfolk, Dallas-Ft. Worth, San Antonio, Houston, New Orleans-Baton Rouge, Jacksonville, Tampa-St. Petersburg-Orlando, Miami and Honolulu.

<sup>2/</sup> *Amendment of the Commission's Rules to Establish Part 27, the Wireless Communications Service ("WCS")*, GN Docket No. 96-228, FCC 96-441, *Notice of Proposed Rule Making* (rel. Nov. 12, 1996), *summarized*, 61 Fed. Reg. 59048 (Nov. 20, 1996) ("Notice").

<sup>3/</sup> Omnibus Consolidated Appropriations Act of 1997, Pub. L. No. 104-208, 110 Stat. 3009 (1996).

MHz to wireless services,<sup>4/</sup> consistent with international frequency allocations for these bands. The use of such frequencies is to be allocated by competitive bidding procedures under Section 309(j) of the Communications Act of 1934, as amended (the “Act”). The requisite auction must begin before April 15, 1997 and be concluded in time to permit all auction proceeds to be on deposit with the United States Treasury by September 30, 1997. In reallocating these frequency bands, the Commission is directed to promote efficient use of the spectrum and to take into account the needs of public safety radio services.

To that end, the Commission has issued the *Notice* proposing to establish a new Wireless Communications Service (“WCS”). The Commission proposes to permit WCS licensees to provide any fixed, mobile or radiolocation service, or satellite DARS.<sup>5/</sup> The Commission also proposes to award WCS licenses through a competitive bidding process with no eligibility restrictions for WCS licenses, and to allow WCS licensees to partition their service areas, disaggregate spectrum, and franchise portions of their spectrum or service areas on a leased basis.

PrimeCo notes with approval that the Commission has drawn few conclusions regarding how it should comply with its statutory directive, and instead seeks comment on “the best use of this spectrum and the most efficient and efficacious

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<sup>4/</sup> Currently, the only non-Government use of the 2300-2310 MHz bands in the United States is by the amateur radio service, which operates in this spectrum on a secondary basis. In 1995, the 2310-2360 MHz band was reallocated to satellite Digital Audio Radio Services (“satellite DARS”) in the United States.

<sup>5/</sup> *Id.*

regulatory regime.”<sup>6/</sup> PrimeCo believes that this careful approach is warranted given the potential impact of WCS licensing upon Commercial Mobile Radio Services (“CMRS”) licensees and the public interest. The Commission has endeavored to establish through competitive auctions, and other regulatory means, a rational and comprehensive CMRS spectrum allocation and licensing scheme which fosters regulatory parity and competition among CMRS providers, and ensures that new and innovative technologies are readily available to consumers. PrimeCo submits that the Commission should not upset this scheme by establishing a disparate and more favorable regulatory treatment to a new competitive wireless communications service. Creating regulatory disparity among services at this late date will adversely affect competition thereby delaying the provision of services, discouraging capital investment, and undermining the value of CMRS spectrum.

The public interest requires that implementation of the new WCS be undertaken in a manner that ensures regulatory parity and avoids prejudice to existing licensees and allocation schemes. WCS licenses should be awarded on an MTA basis. Licensing on an MTA basis would promote the rapid deployment of a wide variety of services and providers. Further, the Commission should adopt build-out and other technical requirements for WCS licenses comparable to those imposed upon other CMRS licensees. Moreover, to encourage participation by small businesses, the Commission should limit WCS licenses to 5 MHz spectrum blocks in a given geographic area and allow licensees freedom to aggregate and disaggregate WCS spectrum, or exempt WCS

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<sup>6/</sup> *Id.*, Separate Statement of Commissioner James H. Quello.

spectrum from the CMRS spectrum cap rules. Finally, the Commission should consider allocating a portion of the relevant spectrum to public safety radio services.

## **II. THE PUBLIC INTEREST REQUIRES THAT IMPLEMENTATION OF THE NEW WCS AVOID PREJUDICE TO EXISTING LICENSEES.**

As contemplated by the *Notice*, the new WCS would be a service of unprecedented regulatory status. The Commission proposes to permit WCS licensees to provide *any* fixed, mobile or radiolocation service, or satellite DARS.<sup>7/</sup> The Commission is also considering adopting *no* eligibility restrictions for WCS licenses, other than foreign ownership restrictions.<sup>8/</sup> Finally, the Commission is considering whether to issue nationwide licenses<sup>9/</sup> and to allow WCS licensees to partition their service areas, disaggregate spectrum, and franchise portions of their spectrum or service areas on a leased basis.<sup>10/</sup>

PrimeCo generally supports flexible spectrum use. Nevertheless, PrimeCo believes that in the current regulatory environment, the degree of flexibility being considered for WCS will adversely affect competition in wireless services thereby delaying the provision of services, discouraging capital investment in CMRS licenses and undermining the value of CMRS spectrum. The Commission has allocated more than

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<sup>7/</sup> *Id.*

<sup>8/</sup> *Id.* at ¶ 23.

<sup>9/</sup> *Id.* at ¶ 10.

<sup>10/</sup> *Id.* at ¶¶ 27-29.

205 MHz of spectrum that may be used to provide CMRS services.<sup>11/</sup> Moreover, the Commission held competitive auctions for PCS licenses in which billions of dollars were spent simply to acquire the finite number of PCS licenses available.<sup>12/</sup>

The value placed upon these licenses is based in part upon the limited number of licenses as well as the bidders' reasonable expectation of a rational, comprehensive regulatory regime that promotes fair and efficient competition for the provision of wireless telecommunications services. It is axiomatic that fair and efficient competition requires that no participant or class of participant bear extraordinary regulatory burden or benefit from disparate regulatory treatment. Indeed, Section 332 of the Communications Act mandates a basic level of regulatory parity between PCS and other CMRS providers as a necessary condition precedent for full and fair competition.<sup>13/</sup>

As currently contemplated in the *Notice*, however, the allocation of an additional 30 MHz of spectrum for potential CMRS uses may undermine the reasonable expectations of regulatory parity among wireless services providers and have negative competitive impacts. The Commission clearly envisions WCS as being yet another

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<sup>11/</sup> See *Implementation of Sections 3(n) and 332 of the Communications Act*, GN Docket No. 93-252, *Third Report and Order*, 9 F.C.C.R. 7988, 8108 (1994). CMRS licenses range in size from 30 MHz Broadband PCS licenses to 1.55 MHz 220 MHz SMR licenses. Cellular, PCS, and SMR spectrum account for 189 MHz of the 205 MHz available for CMRS. *Id*

<sup>12/</sup> Indeed, in the recent broadband PCS auctions, PrimeCo alone spent approximately \$1.1 billion to acquire its licenses. In the ongoing D, E, and F Block auctions, over \$2 billion has been bid to date.

<sup>13/</sup> As recognized by the Commission, regulatory parity among wireless telecommunications providers is consistent with the legislative intent of the Omnibus Budget and Reconciliation Act of 1993. See *Implementation of Sections 3(n) and 332 of the Communications Act*, GN Docket No. 93-252, *Second Report and Order*, 9 F.C.C.R. 1411, 1424 (1994).

competitor in the provision of wireless services. Nevertheless, the Commission is considering providing this service with substantial regulatory preferences such as nationwide licensing, and no eligibility or build-out requirements. Such action on the Commission's part would, therefore, devalue the PCS licenses and could jeopardize the ability of winning PCS bidders to acquire the capital necessary to build out their PCS systems successfully and provide service to the public.

The Commission's proposal would harm large CMRS licensees but would likely devastate smaller businesses, possibly preventing many of them from entering the CMRS marketplace at all. The Commission is well aware of the financial strain placed on businesses by the cost of acquiring PCS licenses at auction. Indeed, many financial institutions have reportedly questioned the prices paid to acquire these licenses and some small businesses have been unable to satisfy their payment obligations for C Block PCS licenses. If an additional 30 MHz of spectrum becomes available for CMRS use in a way that provides WCS licensees a competitive advantage over PCS licensees and current D, E, and F Block bidders, financial institutions may be unwilling to extend resources to finance the development of licensed PCS systems. This result is directly contrary to the Commission's important policies of fostering competition and ensuring that new and innovative technologies are readily available and therefore flies in the face of the express intent of the Communications Act and Appropriations Act.

The Appropriations Act requires that the Commission utilize the competitive bidding procedures established in Section 309(j) of the Communications Act.<sup>14/</sup> Section 309(j) establishes a number of statutory policies that constrain the Commission's

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<sup>14/</sup> See Appropriations Act § 3001(a)(2) (*citing* 47 U.S.C. § 309(j)).



actions in this proceeding. Section 309(j)(3) provides in pertinent part that “[i]n identifying classes of licenses and permits to be issued by competitive bidding, in specifying eligibility and other characteristics of such licenses and permits, and in designing the methodologies for use under this subsection, the Commission shall include safeguards to protect the public interest in the use of the spectrum and shall seek to promote” certain specified objectives.<sup>15/</sup> Among those objects are:

promoting economic opportunity and competition and ensuring that new and innovative technologies are readily accessible to the American people by avoiding excessive concentration of licenses and by disseminating licenses among a wide variety of applicants.<sup>16/</sup>

Further, Section 309(j)(4) provides in pertinent part that in prescribing regulations to implement these objectives, the Commission shall:

include performance requirements, such as appropriate deadlines and penalties for performance failures, to ensure prompt delivery of service to rural areas, to prevent stockpiling or warehousing of spectrum by licensees or permittee, and to promote investment in and rapid deployment of new technologies and services.<sup>17/</sup>

Section 309(j)(4) also directs the Commission to:

prescribe area designations and bandwidth assignments that promote (i) an equitable distribution of licenses and services among geographic areas, (ii) economic opportunity for a wide variety of applicants, including small businesses, rural telephone companies, and businesses owned by members of minority groups and women,

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<sup>15/</sup> 47 U.S.C. § 309(j)(3).

<sup>16/</sup> *Id.* § 309(j)(3)(B).

<sup>17/</sup> *Id.* § 309(j)(4)(B).

and (iii) investment in and rapid deployment of new technologies and services.<sup>18/</sup>

Finally, Section 309(j)(7) provides that “[i]n making a decision . . . to assign a band of frequencies to a use for which licenses or permits will be [auctioned], and in prescribing regulations pursuant to paragraph (4)(C) of this subsection, *the Commission may not base a finding of public interest, convenience, and necessity on the expectation of Federal revenues from the use of a system of competitive bidding . . .*”<sup>19/</sup> Section 309(j)(7) similarly constrains the extent to which the Commission may consider the expectation of Federal revenues in prescribing rules for auctions under Section 309(j).<sup>20/</sup>

In sum, the Appropriations Act, when read together with Section 309(j), makes clear that the expectation of federal revenue is to have only limited importance in the auction process. Indeed, Section 309(j) requires that, among other things, the Commission: (1) take into account the economic and competitive impacts of the new spectrum auction; (2) establish performance requirements to prevent stockpiling or warehousing of spectrum; (3) provide economic opportunity for a wide variety of

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<sup>18/</sup> *Id.* § 309(j)(4)(C).

<sup>19/</sup> *Id.* § 309(j)(7) (emphasis supplied). In essence, Section 309(j)(7) expresses Congress’s intent that “the FCC make its decisions based on sound communications policy pursuant to the Communications Act,” and clarified that “important communications policy objectives should not be sacrificed in the interest of maximizing revenues from auctions.” H.R. Report No. 111, 103d Cong., 1st Sess. 254, 258 (1993).

<sup>20/</sup> 47 U.S.C. § 309(j)(7).

potential licensees; and (4) promote investment in and rapid deployment of new technologies.<sup>21/</sup> Insofar as establishment of the WCS as a new CMRS competitor may significantly disrupt the ongoing deployment of PCS and undermine the value of CMRS licenses purchased at auction, PrimeCo submits that the Commission must carefully tailor the regulatory structure of the new service to avoid or mitigate such disruption and comply with the requirements of the Communications Act. To that end, PrimeCo offers the following additional comments regarding the proposed WCS auction and the regulatory treatment of the service.

### **III. WCS LICENSES SHOULD BE AWARDED ON AN MTA BASIS**

In establishing the PCS spectrum allocation, the Commission considered and expressly rejected the possibility of awarding PCS licenses on a nationwide basis. According to the Commission, nationwide licensing “would maximize economies of scale and scope as well as the other benefits of large service areas . . . but would allow the smallest number of firms to participate.”<sup>22/</sup> The Commission ultimately adopted MTA/BTA service areas, however, on the basis that “a combination of MTA and BTA service areas would promote the rapid deployment and ubiquitous coverage of PCS and a variety of services and providers.”<sup>23/</sup> The combination of MTA and BTA licenses gives

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<sup>21/</sup> See *id.* § 309(j)(4).

<sup>22/</sup> *Amendment of the Commission’s Rules to Establish New Personal Communications Services, NPRM and Tentative Decision*, 7 F.C.C.R. 5676, 5700-01 (1992).

<sup>23/</sup> *Amendment of the Commission’s Rules to Establish New Personal Communications Services, Second Report and Order*, 8 F.C.C.R. 7700, 7730

“licensees the opportunity to select and combine service areas and promote broad participation in the provision of PCS services by firms of various sizes.”<sup>24/</sup> MTA licensing “will permit [MTA] licensees to operate in large service areas which will facilitate interoperability and roaming across wide geographic areas.”<sup>25/</sup> The Commission also found that BTA licensing promoted economic opportunities for designated entities and wide dissemination of licenses.<sup>26/</sup>

PrimeCo submits that the Commission must act within the CMRS allocation scheme established in the PCS proceedings. PCS licenses were granted on an MTA basis with the reasonable expectation that licensees would not face nationwide competition. Again, for the Commission to change the rules of competition by permitting nationwide licensing at this late date would not serve the public interest. Moreover, PrimeCo submits that the statutory mandate of Section 309(j) requiring rapid deployment of WCS and broad participation in the provision of WCS services by firms of various sizes also dictates that WCS should be licensed on an MTA basis, consistent with PCS licenses. Moreover, as in the PCS context, nationwide licensing would permit the smallest number of firms to participate in this auction ultimately reducing competition both in the auction and ultimately in the provision of WCS.

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<sup>23/</sup> (...continued)  
(1993).

<sup>24/</sup> *Amendment of the Commission's Rules to Establish New Personal Communications Services, Memorandum Opinion and Order*, 9 F.C.C.R. 4957, 4988 (1994).

<sup>25/</sup> *Id.*

<sup>26/</sup> *Id.*

#### **IV. WCS LICENSES SHOULD BE SUBJECT TO BUILD-OUT REQUIREMENTS.**

Section 309(j) of the Act directs the Commission to establish auction rules that, among other things, “prevent stockpiling or warehousing of spectrum by licensees . . . and . . . promote investment in and rapid deployment of new technologies and services.”<sup>27/</sup> The Commission has recognized that construction requirements are necessary to achieve these goals.<sup>28/</sup> PrimeCo submits therefore that the new WCS should have build-out requirements comparable to those adopted for PCS and the recently-created General Wireless Communications Service (“GWCS”).

This conclusion is further supported by the dictates of regulatory parity. Both PCS and GWCS have comparable build-out requirements and at the time spectrum was allocated to these services there was no reason to expect competition from new services without comparable requirements. The Commission simply should not change the competitive rules at this late date as a matter of regulatory and competitive parity.<sup>29/</sup>

#### **V. WCS LICENSES SHOULD BE AWARDED IN 5 MHz BLOCKS.**

In creating the GWCS, the Commission decided to award 5 MHz licenses.<sup>30/</sup> PrimeCo submits that a similar approach should be followed for WCS. The

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<sup>27/</sup> 47 U.S.C. § 309(j)(4)(B).

<sup>28/</sup> See 9 F.C.C.R. at 5018; see also *Allocation of Spectrum Below 5 GHz Transferred from Federal Government Use*, ET Docket No. 94-32, *Second Report and Order*, 11 F.C.C.R. 624, 670 (1995).

<sup>29/</sup> See 47 C.F.R. §§ 24.203(a) and 26.102.

<sup>30/</sup> See 11 F.C.C.R. at 645.

issuance of 5 MHz licenses, coupled with a liberal aggregation policy, was determined to be sufficient to accommodate the various interactive, video, voice, and data services contemplated for the GWCS.<sup>31/</sup> In fact, it was noted in the PCS docket that, with digital technology, a 5 MHz allocation could provide twice the capacity of current analog cellular systems.<sup>32/</sup> Moreover, a single 5 MHz block is more than the total amount of spectrum available for Narrowband PCS and equals the amount of spectrum available for 900 MHz SMR. If licensees are permitted to aggregate blocks, issuance of 5 MHz licenses would ensure that the spectrum is being put to its most efficient use. A licensee needing only 5 MHz of spectrum can acquire the amount of spectrum desired; similarly, a licensee needing 15 MHz can acquire the desired amount of spectrum. If WCS providers are licensed to use larger spectrum blocks, many bidders must pay for spectrum that they do not need.

Finally, the 5 MHz spectrum blocks should allow a greater number of potential licensees to participate in WCS. Current Commission rules provide that no licensees in the "broadband PCS, cellular, or SMR services (including all parties under common control) regulated as CMRS . . . shall have an attributable interest in a total of more than 45 MHz of licensed broadband PCS, cellular, and SMR spectrum regulated as CMRS with significant overlap in any geographic area."<sup>33/</sup> If WCS spectrum is not exempted from this spectrum cap, licensing WCS for larger spectrum blocks (*i.e.*, 10, 15

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<sup>31/</sup> *Allocation of Spectrum Below 5 GHz Transferred from Federal Government Use*, ET Docket No. 94-32, *First Report and Order and Second Notice of Proposed Rule Making*, 10 F.C.C.R. 4769, 4806 (1995).

<sup>32/</sup> *See* 8 F.C.C.R. at 7721.

<sup>33/</sup> 47 C.F.R. § 20.6.

or 30 MHz) will prevent many well-qualified CMRS providers from competing for WCS licenses. Such a result is directly contrary to the Commission's obligation to "prescribe area designations and bandwidth assignments that promote . . . economic opportunity for a wide variety of applicants."<sup>34/</sup>

Therefore, PrimeCo urges the Commission to license WCS for 5 MHz spectrum blocks. In the alternative, PrimeCo submits that WCS spectrum should be exempt from the CMRS spectrum cap. Such action is necessary to ensure that the Commission has a wide variety of applicants.

## **VI. PUBLIC SAFETY RADIO SERVICE CONSIDERATIONS**

According to the Commission, "the Appropriations Act marks the first time that Congress has specifically directed the Commission to consider the needs of public safety radio services in connection with licensing a particular spectrum band."<sup>35/</sup>

PrimeCo notes, however, that the National Telecommunications and Information Administration Organization Act required that, in allocating and assigning former Federal Government spectrum, the Commission must "ensure . . . the safety of life and property in accordance with the policies of section 1 of the [Communications Act]."<sup>36/</sup> Although the GWCS frequency allocation was subject to this requirement, the Commission concluded that the record in that proceeding did "not . . . provide a sound basis for

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<sup>34/</sup> 47 U.S.C. § 309(j)(4)(C)(ii).

<sup>35/</sup> *Notice* at ¶ 19.

<sup>36/</sup> 47 U.S.C. § 925(b)(1)(C).

concluding that any or all of the 4660-4685 MHz band should be assigned [to public safety mobile and aeronautical video operations].<sup>37/</sup>

In point of fact, there is an identified need for additional spectrum to be allocated to public safety radio services and this is the first opportunity since the GWCS frequency allocation for the Commission to allocate spectrum to that need.<sup>38/</sup> Therefore, assuming that the frequency bands being allocated in this proceeding can meet the needs for public safety radio services, PrimeCo urges the Commission to allocate a portion of the spectrum to such uses. The Appropriations Act's mandate to take into account the needs of public safety radio services coupled with the fact that spectrum is already allocated to such services<sup>39/</sup> provides the legal authority for a public safety allocation in this instance.

## VII. CONCLUSION

For the foregoing reasons, PrimeCo respectfully urges the Commission to implement the new WCS in a manner that avoids prejudice to existing CMRS licensees and the public interest. Specifically, PrimeCo opposes nationwide licensing for WCS and recommends that the Commission award WCS licenses on an MTA basis. The Commission should also adopt build-out and other technical requirements for WCS licenses that are comparable to those imposed upon other CMRS licenses. Moreover, to encourage participation by small businesses and facilitate full and fair competition,

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<sup>37/</sup> 11 F.C.C.R. at 636.

<sup>38/</sup> *Notice* at ¶¶ 20-21.


<sup>39/</sup> 47 C.F.R. §§ 90.19, 90.21, 90.27 and Part 90, Subpart C.



PrimeCo recommends that the Commission limit WCS licenses to 5 MHz of spectrum and allow licensees freedom to aggregate and disaggregate WCS spectrum, or exempt WCS spectrum from the CMRS spectrum cap rules.

Respectfully submitted,

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Date: December 4, 1996

## **CERTIFICATE OF SERVICE**

I, Shelia Smith, do hereby certify that I have, on this 4th day of December, 1996, served via hand delivery a copy of the foregoing PrimeCo Personal Communications, L.P. Comments in GN Docket No. 96-228 upon the following:

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